

**IN THE DRAWINGS:**

Figure 4 has been amended. A replacement sheet is included herewith.

## **REMARKS**

Claims 21-50 were pending in the application. Claims 22-27 were withdrawn from consideration. Claim 21 has been amended. Claims 33 and 34 have been cancelled. Claims 21, 28-32 and 35-50 remain pending and under consideration in the present application.

### **Objection to the Drawings:**

The drawings were objected to under 37 CFR 1.83(a). Figure 4 has been amended. Applicant submits that the amended version of Figure 4 is in compliance with 37 CFR 1.83(a), and thus respectfully requests removal of the objection.

### **35 U.S.C. § 112 Rejection:**

Claims 21 and 28-50 were rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the enablement requirement. Applicant has amended claim 1 to recite “at least one semiconductor die having a bottom surface attached to at least one of said first and second die attach paddles.” In light of this amendment, Applicant submits that claim 28 further limits the subject matter of claim 21, from which it depends. Applicant further submits that pending claim 21 complies with the enablement requirement of 35 U.S.C. § 112, first paragraph. Accordingly, removal of the rejection is respectfully requested.

### **35 U.S.C. § 102 and § 103 Rejections:**

Claims 21, 28-32, 35, 37-42, 44-46, and 48 were rejected under 35 U.S.C. § 102(e) as being anticipated by Weiblen, U.S. Patent 6,528,868. Claim 33 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Weiblen in view of Applicant’s Admitted Prior Art (APAA). Claims 43, 47, and 49-50 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Weiblen. Applicant respectfully traverses these rejections.

With respect to the § 102(e) rejection, **the cited reference does not teach or suggest all of the elements of the independent claim.** Weiblen teaches a lead frame

device having a lead frame made of copper, copper alloy or copper compound having a die pad area, within which a chip is to be mounted, and having a multiplicity of leads, which are arranged around the die pad area; and having a die pad made of silicon which is mounted in the die pad area on the lead frame to accommodate the chip.

Applicant's independent claim 21 recites, in pertinent part:

"A semiconductor device, comprising:

a first die attach paddle made of an electrically conductive material, wherein the first die attach paddle is electrically coupled to analog circuitry; a second die attach paddle made of an electrically conductive material, wherein the second die paddle is electrically coupled to digital circuitry ... wherein the first and second die attach paddles are connected to provide ground contacts for analog and digital signals, respectively; and wherein the first and second die attach paddles are exposed on the bottom surface of the semiconductor device package." (Emphasis added).

Weiblen does not teach or suggest this combination of features. In particular, Applicant can find no teaching or suggestion of a first die paddle electrically coupled to analog circuitry and a second die paddle electrically coupled to digital circuitry, wherein the first and second die attach paddles are connected to provide ground contacts for analog and digital signals, respectively. In the office action, the Examiner contends that Weiblen teaches a first semiconductor die arranged for processing analog signals and a second semiconductor die arranged for processing digital signals in Fig. 5 and in col. 4, lines 1-4. In col. 3, line 67 and col. 4, lines 1-4, Weiblen teaches:

"Tie bars 225, 225' are made of copper and constitute a part of the lead frame. On die pad 150"" a processor chip 200 is mounted, and on die pad 150"" a sensor chip 201 is mounted. 250 designates one of a multiplicity of bonding wires provided."

However, Weiblen does not specify what types of signals (analog or digital) are processed by processor chip 200. With regard to sensor chip 201, Weiblen mentions a

micromechanical sensor chip in col. 1, line 13, but does not specify what type of circuitry the chip includes. In general, Weiblen does not provide any teaching as to whether processor chip 200 and sensor chip 201 are analog, digital, or mixed signal integrated circuits. In contrast, Applicant's independent claim 21 recites the first die attach paddle as being electrically coupled to analog circuitry and providing ground contacts for analog signals, and further recites the second die attach paddle as being electrically coupled to digital circuitry and providing ground contacts for digital signals. Accordingly, Applicant submits that a case of anticipation has not been established, and thus respectfully requests removal of the 35 U.S.C. § 102(e) rejection.

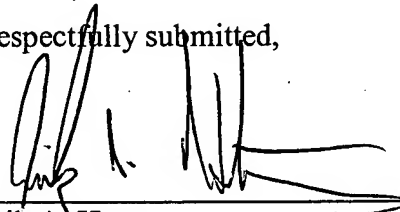
With respect to the 35 U.S.C. § 103 rejections, Applicant submits that, for at least the reasons stated above with regard to the § 102 rejection, the cited references, taken singly or in combination, do not teach or suggest all of the elements of the independent claims. Accordingly, removal of the § 103 rejections is respectfully requested.

**CONCLUSION**

Applicant submits the application is in condition for allowance, and an early notice to that effect is requested.

If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5500-79302/EAH.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Erik A. Heter', written over a horizontal line.

Erik A. Heter  
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